

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

TYRONE KEYS

Plaintiff,

V.

Case No. 8:18-cv-02098-CEH-JSS

**BERT BELL/PETE ROZELLE NFL  
PLAYER RETIREMENT PLAN and the  
NFL PLAYER DISABILITY &  
NEUROCOGNITIVE BENEFIT PLAN**

Defendants.

**DECLARATION OF MICHAEL L. JUNK IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE  
TO FILE FIRST AMENDED ANSWER**

I, MICHAEL L. JUNK, declare the following:

1. I am over the age of 18, and I am otherwise fully competent to testify to the matters stated in this Declaration.

2. I am Of Counsel at Groom Law Group, Chartered, in Washington, DC. I represent the Bert Bell/Pete Rozelle NFL Player Retirement Plan (“Retirement Plan”) and the NFL Player Disability & Neurocognitive Benefit Plan.

3. I make this Declaration in support of the Plans' Opposition to Plaintiff's Motion for Leave to File First Amended Answer to Defendants' Counterclaims Seeking Recovery of Disability Benefit Overpayments or the Full Value Thereof (ECF 46).

4. Attached as Exhibit A is a true and correct copy of the Retirement Board's final decision letter, dated February 26, 2018, regarding Tyrone Keys disability benefits.

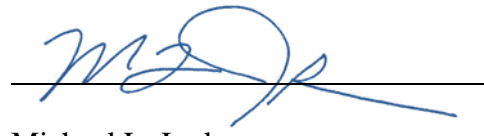
5. Attached as Exhibit B are true and correct copies of the governing documents of

the Retirement Plan effective at present and/or during the time Tyrone Keys was receiving total and permanent disability benefits.

6. Attached as Exhibit C are true and correct copies of the governing documents of the Disability Plan effective at present and/or during the time Tyrone Keys was receiving total and permanent disability benefits.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 10, 2019



Michael L. Junk